

**Notes from Food Service Rule Revision Workgroup Meeting
3/13/02 - Kent**

The second Food Service Rule Revision Workgroup meeting was held at the Department of Health (DOH) offices in Kent on Wednesday, March 13, 2002. The following were in attendance:

Name	Representing
Mary Bolanos	WA Dept. of Social & Health Services – ORM
Stan Bowman	Washington Restaurant Association
Amy Brackenbury	Washington Food Industry
Ray Byrne	Spokane Regional Health District
Joe Graham	Clallam County Health Dept.
John Hadman	Skagit County Health Dept.
Bonnie Halvorson	Bremerton-Kitsap County Health Dist.
Dan Jemelka	WA Dept. Agriculture – Food Safety
Adam Johnson	Albertsons
Katey Kennedy	FDA
Gary Kickbusch	Public Health - Seattle & King County
Laura Martin	Chelan-Douglas Health Dist.
Rick Miklich	Snohomish Health District
Jess Mosley	Mason County Health Dept.
Nancy Nesel	Tricon Global Restaurants
Jim Pressley	WA Dept. Agriculture – Food Safety
Sandy Shaw	Haggen Foods
Brad Simpson	WA Department of Corrections
Sharon Smith	Public Health - Seattle & King County
Jim Thompson	Public Health - Seattle & King County
Diane Westbrook	Tacoma-Pierce County Health Dept.
Daniel Wilson	Grant County Health Dist.
Leonard Winchester	Public Health - Seattle & King County
Lisa Wright	Jack in the Box, Inc.
Dave Gifford	WA Department of Health
Ned Therien	WA Department of Health
Jan Jacobs	WA Department of Health

Dave Gifford welcomed everyone to the second meeting of this workgroup. Introductions were made all around. Dave stated the purpose of this workgroup is not to decide specifics of a revised food rule, but to decide whether to revise the state's food service rules by making some changes within the existing structure of Chapter 246-215 WAC, or adopt the current version of the FDA Food Code.

Ned Therien discussed Substitute Senate Bill 6588, which has gone to the Governor for signature. It makes the State Board of Health (SBOH) food service rule preemptive over local rules; prohibits local health jurisdictions from adopting rules that differ from the state code, except on an emergency basis; makes DOH the exclusive interpreter of the rule; and slightly shortens the rule adoption timeline from what we estimated previously. He then went over a summary of comments received regarding the likes and dislikes of both the FDA Food Code and Chapter 246-215 WAC. The summary incorporated comments from attendees of both the Seattle meeting on January 23 and the Spokane meeting on January 30.

Dave asked the workgroup for a show of hands on which document they felt should be used as the base for the food rule revision, the FDA Food Code or existing state WAC. The count was about 60/40 in favor of the FDA Food Code.

Dave stated that, regarding the negative comments on the size of the Food Code, it was critical to remember the FDA Food Code has both an annex and an informational section, plus bigger type, that makes this document appear larger and more complex than it is.

Comments received from the workgroup may reflect personal preference. Protection of public health should be the main focus when deciding whether to use the WAC or the Food Code as a base document for the new food rule. The question posed was: Do we want a code that's primarily either science based, easily enforceable, easily understood, or a combination of these things? If a combination, do any of these features conflict?

A comment was made that the food industry needs something that not only says what's required, but also why. This is important to trainers and helps food workers comply because they understand why a rule is in place. Another comment was that lawyers like the Food Code because it is science-based and easily defensible. It was stated that the new state food rule should be easy to understand, scientifically based, legally defensible, and nationally uniform to make training easier.

It was stated that, ideally, manager training would be done at the state level, based on FDA training programs. The Restaurant Association provides training to small restaurants that don't have their own training programs. If training was based on FDA programs, it could be the same for both big chains and individually owned restaurants across the state. Whether the Food Code or the current WAC structure is used as the base for the rule revision, much training would be needed statewide. Adoption of the FDA Food Code should result in FDA providing more resources for training programs.

Members of the workgroup stated that the FDA Food Code allows more flexibility based on science, which conforms to the Administrative Procedures Act. The greater detail of the Food Code should eliminate some inconsistencies in interpretation. However, even with the adoption of the Food Code, some inconsistencies will remain.

Dave Gifford asked the group what impacts they could foresee in revising the food rule to be more consistent with the Food Code. The following were mentioned:

- ◆ The Red/Blue form would need to be rewritten;
- ◆ Food worker exams and training videos would need to be redone;
- ◆ There would be fiscal impacts associated with printed materials, videos, and staff training.

Ned Therien discussed both Oregon and Montana food rules. Both states recently underwent revisions to their food rules, but used differing approaches: Oregon adopted the 1999 Food Code by reference, keeping the same numbering as FDA, but incorporating specific changes. Montana used their existing food rule as a base, and incorporated some provisions of the 1999 Food Code into it.

Lisa Wright stated she was part of the workgroup that dealt with California's food code revision. At first, the group attempted to use the state code as a base, but that process became so cumbersome and difficult, they ended up proceeding using the Food Code as the base, with modifications.

Dave Gifford reminded the group that, if the FDA Food Code is adopted by reference, a specific version must be adopted (i.e., 1999 version, 2001 version, etc.) and that version would remain in effect regardless of future FDA updates, until the state's rule is amended again. He also stated that Oregon adopted the 1999 version into rule, but also incorporated anticipated changes in the 2001 version, based on votes in the Conference of Food Protection.

Ned discussed input received on the homework assignment, which was to look at the listed differences between the WAC and the FDA Food Code and state a preference of one over the other. From those who responded, the majority preferred the Food Code both overall and for most of the specific differences listed. Ned pointed out that not all differences between the two documents were included in the homework assignment. The differences that seemed to be most significant were listed.

Dave asked the group what the matrix indicated to them. Comments were:

- ◆ Results of the matrix made Oregon's action make sense;
- ◆ The focus of the workgroup should be on items equally split on the matrix so some sort of consensus could be reached;
- ◆ The workgroup is basically on the same page, however consensus may be troublesome on specific items.

Dave asked the workgroup what the advantages would be for using the FDA Food Code as the base document for the state's rule revision. Comments were that the Food Code:

- ◆ Is organized in order of risk: 1.) employees; 2.) food; 3.) facility;
- ◆ Is easier to read and follow, doesn't jump around;
- ◆ Is science-based;
- ◆ Would result in risk-based inspections;
- ◆ Might make future changes to the rule easier to do, because the Food Code keeps the same structure as it changes over the years, while the current WAC format is much different from that structure (future changes would be easier to cross reference if the Food Code structure is adopted).

Insight might be gained from other states that have recently gone through the Food Code adoption process. Arizona's process included preparation of an extensive cost/benefit analysis. Oregon's format might be used as a model because of regional affinities. (It is almost identical to Arizona's format.)

Dave then asked the group what the advantages would be for using the WAC as the base document for the state's rule revision. Comments were that the WAC structure:

- ◆ Is more flexible for interpretation by regulators;
- ◆ Is a known entity;
- ◆ Would have lower fiscal impact;
- ◆ Would result in less involvement with the FDA – the state would have more control;
- ◆ Is easier to read;
- ◆ Might result in a simpler cost/benefit analysis.

Dave stated that no matter which were used as the base for the state's rule revision, the state would end up with either manager certification training or food worker training, but not both. The Restaurant Association disagreed, stating they currently give training videos to food service establishments for food worker training, and that manager training is separate.

Dave asked for another show of hands on which should be used as the base document, the FDA Food Code or existing state WAC. All but one member felt the Food Code was the best document to use as a base for the rule revision. Immediately after the vote, a member of the workgroup suggested that DOH issue a news release when SSB 6558 was signed, stating the state would be adopting the FDA Food Code as the basis of a revision to the food service rule.

Dave told the workgroup their task was completed with their recommendation on the base document to use for rule revision. He said that DOH will decide how to announce the recommendation and to request comments on it. The recommendation and additional comments will be reviewed by DOH management and SBOH representatives before a final decision is made on which document to use to base the revision of Washington's food service rule.

The tentatively scheduled April 10 meeting will not be held. The workgroup will be reformed for the next stage of the revision process. Information on this will be sent to interested parties in the near future.

Summary of Pluses and Minuses for FDA Food Code vs. Chapter 246-215 WAC

Seattle Comments January 23, 2002

<i>Version</i>	<i>Likes</i>	<i>Dislikes</i>
FDA FOOD CODE	<ul style="list-style-type: none"> ◆ Reference list of toxic materials ◆ Training available ◆ Detail ◆ HACCP guidelines ◆ Public health reasons (Annex) ◆ Management/PIC section ◆ Index (listed twice) ◆ Food worker exclusion defined ◆ Knowledge required for person in charge ◆ Expanded definitions ◆ Annex ◆ Specific backup by food science ◆ Updated by others ◆ Specific 	<ul style="list-style-type: none"> ◆ Size of document ◆ Graduated time/temp. requirements ◆ Too much specificity ◆ Exclusion of temporaries, farmers markets, mobiles ◆ Physically cumbersome ◆ Too vague/too global/difficult for specific access ◆ Update timelines every 2 years ◆ Lack of local control ◆ Weighs more ◆ Type needs to be smaller
246-215 WAC	<ul style="list-style-type: none"> ◆ Already used; familiar ◆ General enough to allow interpretation ◆ Short (listed twice) ◆ Easy to reference ◆ Egg cooking temperatures ◆ Allows counties to be more restrictive ◆ Final cook temperatures ◆ Familiarity ◆ Concise / to the point ◆ Portable 	<ul style="list-style-type: none"> ◆ Old, dated ◆ Vague on bare hand contact ◆ Inadequate training specs for food workers ◆ Vague wording ◆ Lack of uniformity using it in the state ◆ No index – hard to find subjects ◆ Less food worker exclusion ◆ Different interpretations ◆ Certain elements outdated

Spokane Comments January 30, 2002

<i>Version</i>	<i>Likes</i>	<i>Dislikes</i>
FDA FOOD CODE	<ul style="list-style-type: none"> ◆ Specific ◆ Index ◆ Comprehensive ◆ Detail ◆ Conforms with other states ◆ Fills in some holes ◆ Expanded definitions 	<ul style="list-style-type: none"> ◆ Less easily distributed ◆ Intimidating for industry ◆ Exempts bed and breakfast establishments ◆ Multiple alternative temperatures ◆ Too much detail on “blue item” issues will result in more impact to small businesses ◆ Unknown impact on inspectors ◆ Less centralized language
246-215 WAC	<ul style="list-style-type: none"> ◆ Less wordy; focuses on critical items ◆ Less intimidating to industry ◆ Has sections for temporary and mobile establishments ◆ Familiarity (know more about impact of changing sections) 	<ul style="list-style-type: none"> ◆ Vague language (generalities) ◆ Too open for interpretation

Major Differences Between WAC 246-215 and FDA 2001 Food Code

Risk Factor	FDA 2001 Food Code Requirement	Prefer FDA Version			WAC 246-215	Prefer WAC Version		
		Ind.	LHJ	Other		Ind.	LHJ	Other
Overall format preference		5	7	2		2	3	1
Definitions	1-201.10(B)(36) Food Establishment does not include a home used to prepare non-PHF for religious or charity function; a “food processing plant”; home day care; bed and breakfast facility	2	6	1	-010(22) Food Service Establishment includes home settings, but a variance may be given; food processing settings, unless licensed by USDA, FDA, or WSDA	2	6	3
	1-201.10(B)(65) Potentially Hazardous Food (PHF) includes cooked plant food; water activity above 0.85; excludes air-cooled hard-boiled eggs with shell intact	5	8	2	-010(40) PHF includes “certain” cooked plant foods; water activity above 0.90; no exclusion for hard-boiled eggs	0	4	2
Person in charge	2-101.11 Be present during hours of operation	5	11	4	No equivalent	1	1	0
	2-102.11 Demonstrate knowledge	6	11	4	No equivalent	0	1	0
	2-201.12 Exclude food workers with diseases and symptoms	5	9	2	-260(2)(c) & (e) Health officer restricts food workers	1	2	2
Hand washing	2-301.12 20-second wash, vigorous, underneath fingernails, between fingers	3	10	2	-080(1) Less specific	2	1	1
	2-301.16 Hand sanitizers must conform to specifics, when used in addition to washing	5	6	2	-080(3) No hand sanitizer specifications, when used in addition to washing	0	5	2
Employee hygiene	2-302.11 Fingernails trimmed, filed, no polish, no artificial nails	4	8	4	No equivalent	1	3	0
	2-303.11 Jewelry and watches not allowed, except smooth wedding bands	4	6	3	No equivalent	1	6	1
	2-401.11 No eating, drinking (except closed beverage containers), tobacco	5	11	3	-080(4) Drinking not addressed	0	1	0
	2-402.11 Hair restraints specified	4	5	4	-080(2)(c) Hair restraints “as necessary”	1	6	0

Risk Factor	FDA 2001 Food Code Requirement	Prefer FDA Version			WAC 246-215	Prefer WAC Version		
		Ind.	LHJ	Other		Ind.	LHJ	Other
Approved source	3-201.11(B) No foods prepared in private homes	5	6	0	-270 Variance allowed for source	0	5	4
	3-201.16 Wild mushrooms must be individually inspected by expert	3	5	3	No equivalent wild mushroom inspection requirement	1	6	1
	3-201.17 Field-dressed wild game must be inspected by veterinarian	2	6	1	-020(6)(d) Health officer may approve road kill meat for use in jails and soup kitchens	2	5	1
	3-202.11 PHF must be 41° F or less at receiving (unless other rules specify otherwise) and not have evidence of temperature abuse	4	9	4	No equivalent receiving temperature	1	2	0
	3-202.14 Milk must be obtained pasteurized	3	6	1	-020(2)(a) Grade A raw milk may be sold for off-premises consumption	2	6	3
	3-203.12 Molluscan shellfish tags received and kept on original container; held for 90 days	4	12	1	-020(3)(b)(iii) Identifying information may be on invoice rather than container; no requirement to keep tags or other identifying information for 90 days	0	0	3
Freeze fish served raw	3-201.11(D) & 3-402.11 Fish served raw must be previously frozen to kill parasites; 3-402.12 Keep records of freezing	4	12	4	No equivalent	0	0	0
Preventing contamination	3-301.11 No bare hand contact with ready-to-eat-foods, except as otherwise approved	2	12	2	-030(1)(g) "Minimize" hand contact by using utensils or gloves when practical; guidance policy	3	0	2
	3-302.11(A)(2) Prevent cross-contamination of different species raw meats	5	9	4	No equivalent requirement between different species	0	3	0
	3-302.13 Pasteurized eggs must be used for undercooked recipes	5	9	4	-070(3)(i) Applies only for health care facilities and nursing homes	0	3	0
	3-304.15 Gloves used for only one task, discarded if soiled or damaged	4	11	4	No equivalent requirement to discard gloves after single task	1	1	0
	No equivalent	0	4	0	-030(1)(j) & (k) Limited use of pooled eggs; no egg-breaking machines	4	7	3
Cooking temperatures	3-401.11(A)(1) 145° F for 15 seconds for eggs and many other foods of animal origin	3	3	4	-070(3)(e) & (f) 140° F for eggs and other foods of animal origin not otherwise specified; eggs may be cooked to less if specifically ordered by consumer	2	7	0

Risk Factor	FDA 2001 Food Code Requirement	Prefer FDA Version			WAC 246-215	Prefer WAC Version		
		Ind.	LHJ	Other		Ind.	LHJ	Other
	3-401.11(A)(2) 155° F for 15 seconds for ground meats, ratites, injected meats, pooled eggs; also table allowing cooking as low as 145° F for 3 minutes	3	4	4	-070(3)(b) Ground beef may be cooked to less if specifically ordered by consumer; no specific requirements for ratites, injected meats; -030(1)(j)(ii) pooled eggs cooked to 140° F	2	6	0
	3-401.11(B) 130-158° F for time specified in table for whole beef and pork	2	2	4	-070(3)(c) 150° F for pork; -070(3)(d) 130° F minimum for rare roast beef ; no table of alternative temperatures	2	8	0
	3-401.11(C) Outside only required to be cooked to 145° F minimum for intact beef steak if labeled "intact beef"	3	3	4	-070(3)(d)(ii) No minimum cooking for beef steak as specifically ordered by consumer	1	7	0
	3-401.12 Microwave cooking of raw PHF to 165° F; procedures specified	3	9	2	No equivalent difference between microwave and convention cooking temperatures	2	2	2
	3-401.13 Fruits/vegetables to be hot held must be cooked to 140° F or greater	5	8	4	No equivalent cooking requirements for fruits and vegetables	0	4	0
Reheating	3-403.11(A) 165° F for 15 seconds	3	5	4	No equivalent time requirement, just temperature	2	6	0
	3-403.11(B) Microwave to 165° F, rotated, stirred, let stand for 2 minutes	3	6	4	No equivalent time requirement, just temperature	2	5	0
	3-403.11(D) 165° F within 2 hours	4	4	1	-070(8)(b) 165° F within 1 hour; within 30 minutes for temporary food service	1	10	2
Thawing	3-501.13 Allows cooking of large pieces of frozen meat or poultry	3	1	2	-070(2)(c) Prohibits cooking of unthawed foods greater than 4 inches thick	1	10	2
Cooling	3-501.14(A) Cooked PHF cooled from 140° F to 70° F within 2 hours and to 41° F or 45° F within 6 hours	5	5	3	-070(6) PHF cooled from 140° F to 45° F within 4 hours	0	7	1
	3-501.14(B) PHF cooled to 41° F or 45° F within 4 hours if prepared from ingredients at ambient temperatures	5	1	2	-050(3)(f) Prepare PHF with ingredients pre-chilled to 45° F	0	11	2
	3-501.15 Cooling methods specified without specific depths	3	1	1	-070(6) Cooling methods more specific, including depths and thicknesses	2	11	3
Cold holding	3-501.16 PHF at 41° F or 45° F if current equipment not capable of maintaining lower temperature; equipment must achieve 41° F within 5 years of rule adoption	4	7	4	-050(3)(a) PHF at 45° F	1	4	0

Risk Factor	FDA 2001 Food Code Requirement	Prefer FDA Version			WAC 246-215	Prefer WAC Version		
		Ind.	LHJ	Other		Ind.	LHJ	Other
Time as control	3-501.19 No cold or hot holding temperature needed if PHF working supply is held before cooking or discarded within 4 hours; time must be marked on food	4	6	4	No equivalent provision allowing room temperature display for a specified period of time	1	6	0
Reduced oxygen packaging	3-502.12(B) HACCP plan required if <i>Clostridium botulinum</i> is hazard	4	4	2	-060(3) HACCP plan and health officer approval required for all foods other than non-potentially hazardous foods, raw meats, certain cheeses	0	8	2
	3-502.12(B)(2)(a) Water activity 0.91 or less is one barrier	4	4	2	-060(3)(a) Water activity of 0.93 or less is barrier	0	7	2
	3-502.12(B)(3) Store at 41° F or less	3	3	2	-060(4)(a) Store at 38° F or less	1	8	2
	3-502.12(B)(4) Label says to store at 41° F or less and discard in 14 days	3	3	2	-060(4)(g) Label says to store at 38° F or less; discard or freeze in 7 days	1	8	2
	3-502.12(B)(7) Training required	3	11	4	No equivalent	1	1	0
Date marking	3-501.17 Ready-to-eat foods, if held more than 24 hours, must be date marked to use within 7 days when stored at 41° F or less and within 4 days if stored at 41-45° F; including opened containers packaged at a food processing plant	2	9	4	No equivalent	2	3	0
Discard time	3-501.18 Ready-to-eat foods must be discarded within 7 days when stored at 41° F or less and within 4 days if stored at 41-45° F; including opened containers packaged at a food processing plant	2	8	4	No equivalent	2	4	0
Consumer advisory	3-603.11 Raw or undercooked ready-to-eat foods of animal origin (intended to be consumed without more processing) must be identified by label, brochure, or on menu; the risk, especially to vulnerable consumers, must be explained.	4	11	4	-040(10) Raw or undercooked ready-to-eat foods of animal origin (intended to be consumed without further processing) must be identified by label, menu, or sign; the risk does not need to be explained, except for raw milk products	1	1	0
Highly susceptible population	3-8 Additional safeguards	4	10	4	No equivalent except – 070(3)(e)(i) eggs pasteurized or cooked to 140° F for certain clients	1	2	0

Risk Factor	FDA 2001 Food Code Requirement	Prefer FDA Version			WAC 246-215	Prefer WAC Version		
		Ind.	LHJ	Other		Ind.	LHJ	Other
Equipment	4-101.16 Sponges may not be used in contact with in-use food-contact surfaces	3	12	4	No equivalent	1	0	0
Cleaning & sanitizing	4-602.11 Food-contact surfaces must be cleaned before each use with a different type of raw animal food; exception for sequence of products requiring higher cook temps; frequency of every 4 hours unless otherwise specified	5	7	4	No equivalent requirement between different types raw animal foods	0	3	0
Mobile food unit	5-3 Mobile water tanks & 5-401 Mobile holding tanks only	0	1	0	-160 Extensive criteria for physical facilities and operation	4	11	3
Temporary food service	No equivalent	0	1	0	-190 Extensive criteria for physical facilities and operation	4	11	4
Waivers	8-103.10 Regulatory authority may grant variance for any portion of this code	4	3	2	-270 [Local] health officer may grant a variance regarding physical facilities, equipment standards, and food source	1	9	2
HACCP	8-201.13 Health officer may require HACCP plan as condition to grant a variance	4	11	4	No HACCP requirement, except for modified atmosphere packaging	1	1	0

Ind. = Industry

Comments received from five food industry representatives on specific items and overall; from two overall only.

LHJs = Local Health Jurisdictions

Comments received from eleven local health jurisdictions on specific items and overall; and from one on specific items only.

Other Governmental

Comments received from three other governmental representatives on specific items and overall; from one on specific items only; and from one overall only.

Favor FDA Food Code

- * Definition of “potentially hazardous food” is backed with science.
- * Person in charge requirements – powerful and rational.
- * The closer we get to national uniformity, the better it will be for everyone.
- * Consistent code language is more credible, easier to understand, easier to use, and easier to apply.
- * Classes and tests (such as from NRA ED) need to be based on consistent codes.
- * Code should serve as an educational tool, as well as an enforcement tool.
- * A local program that can meet FDA program standards will be viewed, in future years, as highly desirable.
- * Meeting FDA program standards opens up opportunities for FDA-funded training and support.
- * “Demonstration of knowledge” provision for operator is better way to obtain food safety than requirement for food handler training, which is a weak and mostly ineffective substitute.
- * “Time as a public health control” cumulative time is less confusing than a two-hour limitation on room temperature preparation.
- * FDA language that fully cooked ready-to-eat foods that have been refrigerated and then prepared for immediate service for an individual customer order may be served at any temperature is clearer than WAC.
- * FDA language encouraging HACCP and allowing variances should be adopted.
- * Just make adjustments for parts of Food Code that are not liked, as other states that have adopted it have done.
- * Need additional definitions that are in Food Code.
- * Need additional provisions that are in Food Code for molluscan shellfish; refuse, recyclables, and returnables.
- * Prefer science-based regulations that are enforced uniformly throughout the industry. Conference for Food Protection allows for comments from industry to be evaluated and Food Code revised by FDA based on best science.
- * Can make minor modifications to fit unique Washington situations.
- * Adopt Food Code by reference with a few major changes and additions put into WAC.
- * Food Code is based on science, is more specific, is clearer, is more definitive, and would make us more consistent with other states.
- * Like more consistency between states, but like some modifications to Food Code.
- * Complete and in depth definitions and interpretations with reasons. Food Code is more stringent where better detail is needed and less stringent where the WAC is excessive. It is easier

Favor Chapter 246-215 WAC

- * Definition of “food service establishment” is better. It works because the rule contains provisions for giving variances for certain requirements (such as dishwasher equipment) for facilities with a home-like setting, but also has requirements for bed and breakfast establishments.
- * Add to current WAC structure specific parts of Food Code that are needed.
- * WAC as base makes it easier to add to and keeps it simpler. Food Code can be used as reference. Need to add public health reasons and index. Clarify any conflicts.
- * Although prefer Food Code overall, keep local health officer’s ability to grant variances, adjust to local circumstances, and exclude ill food handlers.
- * Just take current WAC and make few changes to update it.
- * Keep current WAC structure, making some changes we like from Food Code.

<p>to reference Food Code requirements.</p> <p>* Although prefer WAC structure, updated with some specific provisions from Food Code, the Food Code language is concise and sufficient detail to cover most issues. It also would provide national consistency.</p> <p>The public health reasons and index in the Food Code are good. Index makes things easy to locate. These good points of the Food Code should be incorporated into the WAC structure.</p> <p>* Although prefer keeping WAC structure, make changes we like from Food Code, possibly incorporating specific language from Food Code or as developed by committee. Incorporate structure much like Food Code with table of contents, expanded definitions section, an index, rationale section, inspection forms, inspection procedures, and print in larger font.</p>	
<p><u>Against FDA Food Code</u></p> <p>* Graduated time/temperatures are too complicated and cumbersome.</p> <p>* Although prefer Food Code, there are concerns about possibly being more difficult for inspectors to enforce and for food service operators to understand. Unclear about how food services in homes and bed and breakfasts would be regulated.</p>	<p><u>Against Chapter 246-215 WAC</u></p> <p>* Will FDA training be available if Food Code is not adopted? (FDA training is excellent.)</p>
<p><u>Other</u></p> <p>* Although prefer many of the specific provision of the Food Code, keeping WAC structure, with changes, is probably best.</p> <p>* The simplest version possible, with as much lay language as possible, is best.</p> <p>* Variances that impact food safety should be issued by WA State Dept of Health and be accepted statewide.</p> <p>* Prefer to keep basic WAC structure and reference multiple specific parts of Food Code that we like. Food Code is more clear and consistent; less open to interpretation; and less vague. The public health reasons section in the Food Code is good. However, some parts of the Food Code are too extensive and stress non-critical items. These sections should not be adopted.</p>	